

Claims 1 and 20 as amended hereby.

Applicants' independent Claim I specifically requires a new NEMA-style AC power outlet connector module configured for fitting into a standard cutout for a conventional IEC AC power outlet connector. As amended hereby, independent Claim 1 further requires that the cutout be in an "electrical equipment enclosure wall" (e.g., FIG. 5; page 14, lines 30-31).

The Lee et al. reference neither discloses, teaches nor suggests the providing of NEMA-style AC power outlet connectors. Nor does the Lee et al. reference disclose, teach or suggest the configuring of NEMA-style AC power outlet connectors for fitting into standard electrical equipment enclosure (chassis) wall cutouts for a conventional IEC AC power outlet connector. To the contrary, Lee et al. discloses the installation of various types of electrical connectors that are reconfigured for fitting into universal openings in specially-constructed housings (Lee et al. FIGS. 1-4, 8 and 18-19).

In substantial contrast to Applicants' specifically claimed invention, Lee et al. discloses reconfiguring various types of electrical connectors (FIGS. 4-5 and 17) (but not mentioning NEMA or IEC connectors) into a common size corresponding to the largest-type connector for installation into a single-sized opening in a unique modular housing (FIGS. 1-4, 8 and 18-19) as opposed to an equipment enclosure.

Consequently, all the Lee et al. disclosed connectors would have to be specially manufactured to their specifications, using their modular size restrictions. The Lee et al. housing the specially-manufactured outlets are reconfigured to fit into is a non-standard form factor which would also have to be specially manufactured.

In contrast, Applicants' invention requires the making of a United States-type (NEMA) AC power outlet connector in a form factor that fits into the same standard equipment enclosure wall cutout as a corresponding foreign (IEC) AC power outlet connector. This enables electrical equipment enclosures having IEC cutouts to be used for receiving either NEMA or IEC AC power outlet connectors according to whether the equipment is purchased for use in the United States or abroad. Otherwise, separate equipment enclosures (chassis) would be required, and have to be inventoried, for use with NEMA connectors and for use with IEC connectors, although the equipment would otherwise be substantially the same for both markets.

In this regard, Applicants are involved in a comparatively small electrical (including electronic) equipment manufacturer that is in competition with large manufacturers. Consequently, the minimizing of equipment production costs is important to remaining competitive in the marketplace. Applicants have importantly determined that the use of common equipment enclosures for receiving either NEMA or IEC electrical connectors, according to customer orders, results in significant equipment manufacturing cost savings.

Regarding Applicants' independent Claim 20, such claim, as amended hereby, specifically requires a new NEMA-style power outlet connector module formed from n new NEMA AC power outlet connectors, the new NEMA AC power outlet connector module having a composite body configured for fitting into a standard equipment enclosure wall cutout for a corresponding IEC power outlet connector module formed from "n" IEC AC power outlet connectors (FIG. 15; page 28, lines 4-10).

The Lee et al. reference neither discloses, teaches nor suggests the providing of a NEMA-style AC power outlet connector module formed from m new NEMA AC power outlet connectors, the new NEMA AC power outlet connector module having a composite body portion configured for fitting into a standard equipment enclosure cutout for a corresponding IEC power outlet connector module formed from "n" IEC AC power outlet connectors.

Again as above asserted, in substantial contrast to Applicants' specifically claimed invention, Lee et al. discloses taking various types of electrical outlets and package them in a new form factor that would be modular, and installing them in receptacles in a unique housing. All the Lee et al. outlets would have to be specially manufactured to their specifications, using their modular size restrictions. The housing the specially-manufactured outlets fit into is a non-standard form factor which would also have to be specially manufactured. Applicants' invention is to make one type of AC power outlet connector in a form factor that fits into the same equipment enclosure cutout as an IEC AC power outlet connector.

On the basis of the foregoing, Applicants submit that the Lee et al. reference does not even remotely anticipate Applicant's independent Claims 1 and 20, as amended hereby, under 35 U.S.C. 102(e), and Applicants request that the Examiner reconsider and withdraw his rejection of such claims under 35 U.S.C. 102(e) on Lee et al.

REJECTION OF CLAIMS 1-24 UNDER 35 U.S.C. 103(a):

The Examiner's rejection of Claims 1 through 24 (page 2, Par. 4 of the Office Action) under 35 U.S.C. 103(a) as being unpatentable over Lee et al. (USPN 6,220,880) is hereby traversed insofar as such rejection may be applied to

independent Claims 1, 7, 15 and 20, as amended hereby, and from which the remaining claims depend.

Applicants' above-discussion regarding independent Claims 1 and 20 relative to the Examiner's rejection under 35 U.S.C. 102(e) on Lee et al. is incorporated by reference at this point. Applicants submits that their argument set forth above to overcome the Examiner's rejection of independent Claims 1 and 20 under 35 U.S.C. 102(e) on Lee et al. is equally applicable to the Examiner's rejection under 35 U.S.C. 103(a) on Lee et al., since the Lee et al. reference neither discloses nor teaches or even suggests Applicants' invention claimed in independent Claims 1 and 20.

Applicants' independent Claim 7 requires a specific-sized, standard IEC C13 AC power outlet connector cutout for receiving a new NEMA-style AC power outlet connector; as amended hereby, the cutout is required to be in an electrical equipment enclosure wall. Applicants' independent Claim 15 requires a specific-sized standard IEC C19 AC power outlet connector cutout for receiving a new NEMA-style AC power outlet connector; as amended hereby, the cutout is required to be in an electrical equipment enclosure wall.

Since the Lee et al. reference neither teaches nor suggests the constructing of NEMA-style AC power outlet connectors to fit into a standard electrical equipment enclosure wall cutout for an IEC AC outlet connector, it obviously cannot teach or suggest specific dimensions for the EIC cutout, as claimed in Applicants' independent Claims 7 and 15.

Based on the foregoing, Applicants submit that all independent Claims 1, 7, 15 and 20, as amended hereby, are patentable under 35 U.S.C. 103(a) on Lee et al. Moreover, it follows that since Claims 2-6, 8-14, 16-19 and 21-24

depend respectively from independent Claims 1, 7, 15 and 20 and add further limitations thereto, these dependent claims are necessarily also patentable under 35 U.S.C. 103(a) on Lee et al.

Not notwithstanding the foregoing, dependent Claim 2 requires the IEC connector of Claim 1 to be an IEC C13 connector, dimensions being recited for the associated standard cutout. Lee et al. neither teaches nor suggests such requirements.

Dependent Claim 3 requires the new NEMA-style connector of Claim 2 to be selected from the group consisting of NEMA 5-15R, NEMA 6-15R, NEMA 5-20R and NEMA 6-20R connectors. Lee et al. neither teaches nor suggests such a requirement.

Dependent Claim 4 requires the IEC connector of Claim 1 to be an IEC C19 connector, dimensions being recited for the associated standard cutout. Lee et al. neither teaches nor suggests such requirements.

Dependent Claim 5 requires the new NEMA-style connector of Claim 4 to be selected from the group of NEMA 5-20R and NEMA 6-29R connectors. Lee et al. neither teaches nor suggests such a requirement.

Dependent Claim 6 requires the shoulder portion of the new NEMA-style connector of Claim 4 have mounting holes spaced apart 1.772 inches apart. Lee et al. neither teaches nor suggests such a requirement.

Dependent Claim 8 requires that the body portion of the new NEMA-style connector of Claim 7 includes three terminals extending therefrom, each of the three terminals being configured the same as the terminals of the IEC connector. Lee et al. neither teaches nor suggests such requirements.

Dependent Claim 9 requires that the body portion of the new NEMA-style connector of Claim 7 includes at least one pair of elastic spring retaining clips for retaining the

connector in the IEC-C13 cutout. Lee et al. neither teaches nor suggests such a requirement.

Dependent Claim 10 requires the body portion of the new NEMA-style connector of Claim 7 include three pin wiring terminals having diameters of about 0.06 inches extending from the body, the terminals being mounted to a printed circuit card. Lee et al. neither teaches nor suggests such requirements.

Dependent Claim 11 requires the new NEMA-style connector of Claim 7 to be a NEMA 5-15R connector. Lee et al. neither teaches nor suggests such a requirement.

Dependent Claim 12 requires the new NEMA-style connector of Claim 7 to be a NEMA 6-15R connector. Lee et al. neither teaches nor suggests such a requirement.

Dependent Claim 13 requires the new NEMA-style connector of Claim 7 to be a NEMA 5-20R connector. Lee et al. neither teaches nor suggests such a requirement.

Dependent Claim 14 requires the new NEMA-style connector of Claim 7 to be a NEMA 6-20R connector. Lee et al. neither teaches nor suggests such a requirement.

Dependent Claim 17 requires the body portion of the new NEMA-style connector of Claim 15 is sized and shaped to snap into the standard cutout. Lee et al. neither teaches nor suggests such a requirement.

Dependent Claim 18 requires the new NEMA-style connector of Claim 15 to be a NEMA 5-20R connector. Lee et al. neither teaches nor suggests such a requirement.

Dependent Claim 19 requires the new NEMA-style connector of Claim 15 to be a NEMA 6-20R connector. Lee et al. neither teaches nor suggests such a requirement.

Dependent Claim 21 requires the number "n" of Claim 20 be equal to 3, 3, 4, 5 or 6. Lee et al. neither teaches nor suggests such a requirement.

Dependent Claim 22 requires that the IEC connector module of Claim 20 is formed from "n" IEC-C13 connectors. Lee et al. neither teaches nor suggests such a requirement.

Dependent Claim 23 requires the new NEMA-style connectors of Claim 22 to be selected from the group consisting of NEMA 5-15R, NEMA 6-15R, NEMA 5-20R and NEMA 6-20R connectors. Lee et al. neither teaches nor suggests such a requirement.

Dependent Claim 24 requires the new NEMA connector module of Claim 20 is formed having "m" new NEMA connectors and "n-m" IEC connectors, the number "m" being between 1 and "n". Lee et al. neither teaches nor suggests such requirements.

Applicants' submit that, based on the foregoing, Claims 2-6, 8-14, 16-19 and 21-24 that depend from independent Claims 1, 7, 15 and 20 are independently patentable under 35 U.S.C. 103(a) on Lee et al., and the Examiner is requested to reconsider and withdraw his rejection of Claims 1-24 under 35 U.S.C. 103(a) on Lee et al.

#### SUMMARY

Based on the foregoing, Applicants submit that all Claims 1-24, as amended hereby, are patentable over Lee et al., and allowance of all such claims is solicited from the Examiner.

Respectfully submitted,

  
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